

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

**FILED**  
MAR 20 2019  
CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY 05 DEPUTY CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADRIAN CHRISTOPHER AGUILAR (1)  
and  
ELIZABETH ASHLE BORREGO (2),

Defendants.

CRIMINAL NO.

**INDICTMENT**

[Vio. 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A) & 18 U.S.C. § 2 Aiding and Abetting in the Possession with intent to Distribute 50 grams or more of Methamphetamine, a Schedule II Controlled Substance;

Vio. 18 U.S.C. 924(c) Possession of a Firearm in Furtherance of a Drug Trafficking Offense;

Vio. 18 U.S.C. § 922(g)(1) & 924(a)(2), Felon in Possession of a Firearm;

Vio. 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A) & 18 U.S.C. § 2 Aiding and Abetting in the Distribution of 50 grams or more of Methamphetamine, a Schedule II Controlled Substance: and Vio. 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A) Distribution of 50 grams or more of Methamphetamine]

THE GRAND JURY CHARGES:

**SA 19 CR 0181 DAE**

**COUNT ONE**

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A) & 18 U.S.C. § 2]

On or about December 19, 2018, in the Western District of Texas, Defendants,

**ADRIAN CHRISTOPHER AGUILAR and  
ELIZABETH ASHLE BORREGO,**

aided and abetted by each other, did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved 50 grams or more of Methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

**COUNT TWO**  
[18 U.S.C. §924(c)]

On or about December 19, 2018, in the Western District of Texas, Defendant,

**ADRIAN CHRISTOPHER AGUILAR,**

did knowingly possess firearms, namely: a Taurus Millennium G2, 9mm caliber pistol, Serial Number TKY81448, in furtherance of a drug trafficking crime that may be prosecuted in a court of the United States, that is the offense alleged in Count One, in violation of Title 18, United States Code, Section 924(c).

**COUNT THREE**  
[18 U.S.C. § 922(g)(1) & 924(a)(2)]

On or about December 19, 2018, in the Western District of Texas, Defendant,

**ADRIAN CHRISTOPHER AGUILAR,**

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, namely: a Taurus Millennium G2, 9mm caliber pistol, Serial Number TKY81448, which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT FOUR**  
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A) & 18 U.S.C. § 2 ]

On or about December 17, 2018, in the Western District of Texas, Defendants,

**ADRIAN CHRISTOPHER AGUILAR and  
ELIZABETH ASHLE BORREGO,**

aided and abetted by each other, did unlawfully, knowingly and intentionally distribute a controlled substance, which offense involved 50 grams or more of Methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

**COUNT FIVE**

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)]

On or about November 1, 2018, in the Western District of Texas, Defendant,

**ADRIAN CHRISTOPHER AGUILAR,**

did unlawfully, knowingly and intentionally distribute a controlled substance, which offense involved 50 grams or more of Methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**

**[See Fed. R. Crim. P. 32.2]**

**I.**

**Drug Violations and Forfeiture Statutes**

**[Title 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), subject to forfeiture pursuant to  
Title 21 U.S.C. §§ 853(a)(1) and (2)]**

As a result of the foregoing criminal violations set forth in Count One, Four, and Five, the United States of America gives notice to Defendant's **ADRIAN CHRISTOPHER AGUILAR and ELIZABETH ASHLE BORREGO**, of its intent to seek the forfeiture of the below described properties upon conviction and pursuant to Fed. R. Crim. P. Rule 32.2 and Title 21 USC §§ 853(a)(1) and (2), which state:

**Title 21 USC § 853. Criminal forfeitures**

**(a) Property subject to criminal forfeitures.**

Any person convicted of a violation of this subchapter or subchapter II of this chapter punishable by imprisonment for more than one year shall forfeit to the United States, irrespective of any provision of State law –

- (1) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;**
- (2) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation; ...**

II.

**Firearms Violation and Forfeiture Statutes**

**[Title 18 U.S.C. §§ 924(c) and 922(g)(1), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461]**

As a result of the criminal violations set forth in Counts Two and Three, the United States of America gives notice to Defendant **ADRIAN CHRISTOPHER AGUILAR**, of its intent to seek the forfeiture of the below described properties upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which states:

Title 18 U.S.C. § 924. Penalties

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (g) . . . of section 922 . . . or knowing violation of section 924 . . . shall be subject to seizure and forfeiture. . . under the provisions of this chapter. . .

This Notice of Demand for Forfeiture includes but is not limited to the following properties described below:

1. Taurus Millennium G2, 9mm caliber pistol, Serial Number TKY81448; and
2. Any related ammunition and firearm accessories.

A TRUE BILL

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FOREPERSON

JOHN F. BASH

United States Attorney

By: 

PRISCILLA GARCÍA

Assistant United States Attorney